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## Department of Energy

Richland Operations Office  
P.O. Box 550  
Richland, Washington 99352

92-ERB-088

JUN 09 1992

Mr. Paul T. Day  
Hanford Project Manager  
U.S. Environmental Protection Agency  
712 Swift Boulevard, Suite 5  
Richland, Washington 99352



HEM  
REL RDW  
XC: LD Arnold

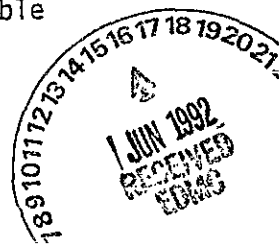
Dear Mr. Day:

## INTERIM MILESTONES FOR 100-KR-1 OPERABLE UNIT (OU)

This letter is a response to a U.S. Environmental Protection Agency, Hanford Project Office (EPA) letter to the U.S. Department of Energy, Richland Field Office (RL), (EPA ltr. to J. D. Goodenough from D. R. Einan, "Remedial Investigation/Feasibility Study Work Plan for the 100-KR-1 Operable Unit, Hanford Site, Richland, Washington, Draft D," dtd February 3, 1992) regarding 100-KR-1 OU work schedule interim milestone (IM) dates. Please refer to the table presented below for EPA's IM descriptions, EPA directed IM completion dates, and RL's proposed IM completion dates.

EPA INTERIM MILESTONE DESCRIPTION	EPA IM COMPLETION	RL IM PROPOSAL
Submit all validated data from sampling activities associated with source and vadose zone investigations.	July 31, 1993	December 1993
Submit a draft 100-KR-1 Remedial Investigation Report.	April 31, 1994	October 1994
Submit a draft 100-KR-1 Feasibility Study report and Interim Remedial Measures Plan.	December 31, 1994	June 1995

RL does not dispute the substantive content of the three IMs identified in the referenced letter (RL has committed to identical content of IMs in work schedules of the 100-BC-1, 100-BC-5, 100-FR-1, 100-FR-3, and 100-KR-4 OU work plans submitted to EPA for public comment). However, RL cannot commit to completing the IMs by dates identified in the referenced letter because RL's Environmental Restoration Program committed to include 100-KR-1 vadose zone borehole drilling work scope in fiscal year 1993, as identified in Draft D of the 100-KR-1 Work Plan submitted to EPA in October 1991. Completion vadose zone borehole drilling in the 100-KR-1 OU is required (critical path) prior to initiating some IM associated tasks. It is RL's understanding that EPA generated three IM dates using the assumption that 100-KR-1 OU vadose zone borehole drilling would be started upon approval of the 100-KR-1 OU Work Plan (the established goal of obtaining EPA approval being April 1992 when Draft D was submitted). RL maintains that IM completion dates proposed in the table above are the earliest IM completion dates to which it can commit to



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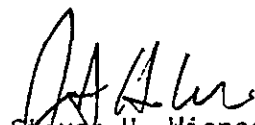
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incorporate into the 100-KR-1 OU work schedule. Any earlier IM completion dates incorporated into the subject OU work schedule would be setting up a schedule for probable failure.

Please address all comments and questions regarding this correspondence or 100 Area past-practice activities to Mr. E. D. Goller on 376-7326.

Sincerely,



Steven H. Wisness  
Hanford Project Manager

ERD:EDG

cc: S. Balone, EM-442  
L. E. Gadbois, EPA  
L. S. Goldstein, Ecology  
R. P. Henckel, WHC  
D. B. Jansen, Ecology  
R. E. Lerch, WHC  
D. Teel, Ecology  
K. M. Thompson, RL  
T. B. Veneziano, WHC  
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Author	Addressee	Correspondence No.
S. H. Wisness, RL (R. E. Day, WHC)	P. T. Day, EPA	Incoming 9203124 Xref 9253465D

Subject: 100-KR-1 OPERABLE UNIT WORK SCHEDULE INTERIM MILESTONES

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